

**EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET
SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230**

**BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196**

August 30, 2021

Hon. John P. Cronan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Filed by ECF

United States v. Gabriel Caballero
21 Cr. 253 (JPC)

Dear Judge Cronan:


We represent the defendant Gabriel Caballero under the Criminal Justice Act. We write to respectfully request a modification to the travel restrictions that are part of Mr. Caballero's bail conditions. Currently, Mr. Caballero's bail conditions include a curfew, location monitoring and his travel is restricted to the Southern and Eastern Districts of New York. For the past few months, Mr. Caballero has been working for a moving service called "Peace and Love Moving" that customers book through the "Moving Help" feature of U-Haul's website. The jobs tend to be located in the Eastern and Southern Districts of New York, as well as in the District of New Jersey. To date, Mr. Caballero has not taken assignments that have been in New Jersey, but with the Court's permission he would like to be available for those opportunities. For this reason, we respectfully request that the Court modify his bail conditions to allow him to travel to the District of New Jersey for the purpose of work. We have discussed this request with the Government and pretrial services, neither of whom have any objection to this request.

The Defendant's request is granted. Mr. Caballero's bail conditions are modified to allow him to travel to the District of New Jersey for the purpose of work.

Respectfully submitted,

Sarah M. Sacks

SO ORDERED.
Date: August 30, 2021
New York, New York


JOHN P. CRONAN
United States District Judge